

Evidence Base	Assessment (SFRA) ¹	
	Strategic Housing Market Assessment (SHMA)	<input type="checkbox"/>
	Viability Study	<input type="checkbox"/>
	Housing and Economic Land Availability Assessment (HELAA)	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.

Growth Options consultation document

7. Are there any infrastructure requirements needed to support the overall scale of growth?

The Growth Options document identifies the provision of 39,000 additional homes from 2017-2036 based upon evidence relating objectively assessed need.

Water and sewerage companies prepare business plans on a 5 year investment cycle. Customer charges will be set following submissions from Anglian Water about what it will cost to deliver the business plan. Anglian Water’s business plan for the next Asset Management Plan period (2020 to 2025) is currently being finalised and is expected to be published in April 2018 for public consultation.

As part of which we are considering the implications of growth outlined in adopted and emerging Local Plans for Anglian Water’s existing infrastructure.

To assist Anglian Water in making future investment decisions we are preparing two key long term strategies relating to the provision of water and water recycling infrastructure managed by Anglian Water as follows:

- Water Resource Management Plan (WRMP) for Defra’s approval and
- Long Term Water Recycling plan.

The WRMP outlines the predicted supply/demand balance by water resource zones and identifies the proposals needed to meet the expected demand for additional water supply from new housing and development more generally. We have recently published a Draft WRMP for public consultation which outlines proposals to how we will manage the supply/demand balance so that we can continue to meet

¹ Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from [here](#)

the needs of our customers for water in the Greater Norwich area.

We also closely monitor growth in our region and develop investment plans to reduce flow and load from the catchment or provide additional treatment capacity when appropriate.

We are currently in the process of finalising a Long Term Water Recycling Plan which will set out a long term strategy to identify the need for further investment by Anglian Water at existing water recycling centres or within foul sewerage catchments to accommodate the anticipated scale and timing of growth in the company area . This document once finalised will be used to inform future business plans including the business plan currently being prepared for 2020 to 2025 –

We have considered a range of solutions within sewer catchment or at the Water Recycling Centre to accommodate further growth as part of this plan. WRC upgrades will not be the most appropriate solution in all cases.

Anglian Water as a water and sewerage company seeks fair contributions through charges directly from developers under the provisions of the Water Industry Act 1991 to supply water and/or drain a site effectively. As such we would not, in most cases, make use of planning obligations or standard charges under Planning Legislation for this purpose.

Charging mechanisms will soon be simplified, with most companies now introducing a standard charge for all new dwellings which will be used to fund network improvements. Further information relating to the charges which will come into effect from 1st April 2018 is available to view at the following address:

<http://www.anglianwater.co.uk/developers/charges/>

It is important that any Local Plan policy relating to planning obligations/standard charges also emphasises the need for phasing and the use of planning conditions/obligations, to ensure development is aligned with the provision of water and water recycling infrastructure for this purpose. We suggest that the following wording be included in the new Local Plan:

'Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing.'

We would also ask that Greater Norwich Local Plan includes a policy which is supportive of the principle of water and water recycling infrastructure and development which supports this infrastructure being acceptable in principle in the countryside to ensure that we can continue to facilitate development in the company area.

We are happy to support the Greater Norwich Local Plan Team on the preparation of suitable wording using our experience of local plans elsewhere in the Anglian Water company area prior to the next formal stage of the preparation of the Local Plan.

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

Anglian Water is the land owner of Site R31: Heigham Water Treatment Works, Waterworks Road which is allocated for housing in the adopted Norwich City Site Allocations Plan.

We continue to support the allocation of this site for housing as it is both available and deliverable within the plan period of the new Local Plan.

9. Which alternative or alternatives do you favour?

Anglian Water is the water and sewerage undertaker for Norwich City, Broadland District and South Norfolk District Councils.

We do not have a preference relating to the housing growth options which should be pursued for the Greater Norwich Local Plan area. However there is a need to consider further the implications for Anglian Water's existing water and water recycling infrastructure dependant upon the preferred option for the Greater Norwich Local Plan area.

Reference is made to the need for a Water Cycle Study to support the preparation of the Greater Norwich Local Plan in the Habitats Regulation Assessment Scoping report. We would welcome further discussions with the Greater Norwich Local Plan Team regarding the scope of any technical study in the context of the Draft Water Resource Management Plan and Draft Long Term Water Recycling Plan which are being prepared by Anglian Water. We would wish to agree the scope of any further technical work with the Local Plan Team to ensure it doesn't duplicate any information already set out in Anglian Water's documents.

10. Do you know of any infrastructure constraints associated with any of the growth options?

Please see comments relating questions 7 and 9.

52. Do you support the favoured option for flood risk policy?

Reference is made to the flood risk policy requiring the preparation of a flood risk assessment in accordance with national planning guidance and a Surface water drainage strategy to ensure long term maintenance.

It is important that the new Local Plan considers all sources of flood risk including sewer flooding and the impact of new development on Anglian Water's existing water recycling infrastructure.

We would ask that the new Local Plan policy relating to water supply and flood risk includes the following requirements:

- Applicants to demonstrate that capacity is currently available within the water and public sewerage networks and receiving water recycling centre in Anglian Water's ownership or can be made available in time to serve the development.
- Sustainable Drainage Systems (SuDS) to be identified as the preferred method of surface water disposal and that it is considered as part of the design of

new developments and re-developments. The policy should also ensure that applicants provide evidence as part of the planning application that they have followed the surface water hierarchy as outlined in the National Planning Practice Guidance. With surface water connections to the public sewerage networks being allowed only on an exceptional basis where alternatives are shown to be technically unfeasible.

- That suitable access is safeguarded for the maintenance of existing water and drainage infrastructure following development.

51. Which approach do you favour for air quality?

Water Recycling Centres and large sewage pumping stations were historically built at a distance from existing development because of odour associated with the operation of the sites. Encroachment of receptors, particularly residential development, there is a risk that odour and amenity issues could arise leading to restrictions on the continued use of Anglian Water's existing water recycling infrastructure.

Any policy relating to air quality should require applicants to demonstrate that the continued operation of Anglian Water's water recycling infrastructure will not be prejudiced by occupied land and buildings.

58. Do you support option W1?

Yes - we recognise the ambition of Greater Norwich to ensure demand management through encouraging water efficient new dwellings which was also set out through policy 3 (Energy and water) in the adopted Core Strategy. This contributes towards achieving a supply/demand balance required in our draft water resource management plan.

The main source of information for establishing need for greater water efficiency is the Environment Agency 'Water Stressed Areas Final Classification (2013)', which identifies areas of serious water stress.

The Environment Agency considers that the Greater Norwich authorities (Broadland, Norwich City and South Norfolk) are located in an area of serious water stress as defined in the Environment Agency's map.

The Housing Standards Review Cost Impact report (2014) prepared for DCLG advises that the cost of introducing such a standard would be between £6-£9 per dwelling.

The above report is available to view at the following address:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf

We therefore consider that this does not make the Greater Norwich Local Plan, or individual development proposals, unviable.

Therefore we would fully support the optional water efficiency standard being applied within the Greater Norwich Local Plan area and would ask that the following wording be included in the new Local Plan:

"Development proposals should demonstrate:

Dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2.”

We would also welcome the opportunity to support the local authority and developers to create exemplar developments which seek to go beyond the building regulations, through measures such as site wide water re-use and water harvesting.

Evidence Base: Interim Habitats Regulation Assessment

Para 3.2.1 – Increased pressure on water resources (page 30)

Reference is made to a need for an additional borehole to supply potable (drinking) water. It is unclear on what basis this assumption has been made. Anglian Water has recently published a Draft Water Resource Management Plan which subject to approval by Defra is intended to replace the approved WRMP 2015. We would ask that the Habitats Regulation Assessment makes reference to the findings of this document particularly in relation to the proposals for the relevant Water Resource Zones for the Greater Norwich area.

Para 3.2.1 – Pollution impacts (page 30)

Similarly reference is made to the potential for pollution to the introduction of additional foul flows from new development in the Greater Norwich area to water recycling centres in Anglian Water’s ownership. It should not be assumed that a deterioration of water quality to designated European sites will result from additional development draining to existing WRCs.

WRC permits have a variety of conditions including the permitted dry weather flow(DWF) and the chemical standard of discharge. Permits are issued by the Environment Agency and the conditions applied are site specific, set at a level to ensure sufficient water quality at the discharge point. WRCs are designed to meet the specific conditions within their permit. We regularly monitor our position against both the DWF and the standards, promoting investigation, a change in working practices and investment through our business planning process where required.

Anglian Water through our business planning process promotes investment at WRCs and/or within the sewerage catchment to ensure our water recycling infrastructure is aligned with new development and to ensure we can comply with the permits issued by the Environment Agency.

For the purposes of the Habitats Regulation Assessment it is recommended that that only the WRCs which discharge directly or indirectly to a watercourse which is of European significance should be considered as part of the assessment.

Section 3.4 – increased pressure on water resources (pages 34-36)

This section should be updated to take account of Anglian Water’s Draft WRMP 2018 which is intended to replace the existing WRMP published in 2015.

Section 3.4 – pollution impacts: water pollution (pages 36)

Reference is made to the potential for pollution to the introduction of additional foul flows from new development in the Greater Norwich area to water recycling centres in Anglian Water's ownership. It should not be assumed that a deterioration of water quality to designated European sites will result from additional development draining to existing WRCs. Anglian Water through our business planning process promotes investment at WRC and/or within the sewerage catchment to ensure our water recycling infrastructure is aligned with new development.

WRC permits have a variety of conditions including the permitted dry weather flow(DWF) and the chemical standard of discharge. Permits are issued by the Environment Agency and the conditions applied are site specific, set at a level to ensure sufficient water quality at the discharge point. WRCs are designed to meet the specific conditions within their permit. We regularly monitor our position against both the DWF and the standards, promoting investigation, a change in working practices and investment through our business planning process where required.

Para 4.8 – recommendations for further study (page 46)

Reference is made to the preparation of a Water Cycle Study to assess further the water quality and impacts from additional abstraction.

Proposals for additional water abstraction and any associated sustainability reductions set out by the Environment Agency are normally considered as part of the Water Resource Management Plan process. We are also preparing a Long Term Water Recycling Plan as part of which are considering how we can continue to comply with permits issued by the EA.

Reference is made to the need for a Water Cycle Study to support the preparation of the Greater Norwich Local Plan in the Habitats Regulation Assessment Scoping report. We would welcome further discussions with the Greater Norwich Local Plan Team regarding the scope of any technical study in the context of the Draft Water Resource Management Plan and Draft Long Term Water Recycling Plan which are being prepared by Anglian Water. We would wish to agree the scope of any further technical work with the Local Plan Team to ensure it doesn't duplicate any information already set out in Anglian Water's documents.

Please add additional sheets if necessary

Disclaimer

Data Protection and Freedom of Information

The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name

Date 21st March 2018

Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 22 March 2018**.

By email: gnlp@norfolk.gov.uk

Or, if it is not possible submit the form electronically,

By post to:

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: www.gnlp.org.uk

E-mail: gnlp@norfolk.gov.uk

Telephone: 01603 306603